
From: mdhlaw@haywoode.com
Sent: Tuesday, March 31, 2009 5:14 PM
To: Traub, M. Darren; William Kelly
Subject: Edmonds v. Seavey

Counselors:

Pursuant to my conversations with both Counselors of even date, we propose the following schedule for Depositions when everyone will be available: 4/14/09 John Edmonds, 4/16/09 Orley Cameron, Adam Pryce and Sandra Griffith, 4/20/09 Phyllis Seavey and 4/21/09 Bob Seavey. The only uncertainty is of April 21st, when we are scheduled to select the Jury in the Bronx, but this might be adjourned.

Darren and I have agreed to withdraw the most recent discovery issues pending by Magistrate Francis on 4/3/09, subject to any new issue presenting.

It may become necessary to request additional days for discovery from Judge Baer as Darren and I discussed, but this might be unnecessary if we can work between 4/21/09 and 4/30/09.

M. Douglas Haywoode